

August 10, 2020

The Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

RE: Joint letter proposing briefing schedule for attorneys' fees motion in *State of New York v. Wolf, et al.*, 20 Civ. 1127, and *Lewis-McCoy v. Wolf, et al.*, 20 Civ. 1142.

Dear Judge Furman,

Pursuant to the Court's orders of July 29, 2020, ECF No. 92, and August 7, 2020, ECF No. 96, the parties propose the following schedule to brief attorneys' fees:

1. On **August 31, 2020**, Plaintiffs shall file a motion for attorneys' fees;
2. On **September 10, 2020**, Defendants shall file their opposition; and
3. On **September 17, 2020**, Plaintiffs shall file their reply.

Respectfully submitted,

LETITIA JAMES  
*Attorney General of the State of New York*

By: /s/ Daniela L. Nogueira  
Daniela L. Nogueira, *Assistant Attorney General*  
Matthew Colangelo, *Chief Counsel for Federal Initiatives*  
Elena Goldstein, *Deputy Chief, Civil Rights Bureau*  
Office of the New York State Attorney General  
28 Liberty Street  
New York, NY 10005  
Phone: (212) 416-6544  
daniela.nogueira@ag.ny.gov

Attorneys for Plaintiff in 20 Civ. 1127

NEW YORK CIVIL LIBERTIES UNION FOUNDATION

By: /s/ Antony P.F. Gemmell  
Antony P.F. Gemmell  
Molly K. Biklen  
Jessica Perry

Jordan Laris Cohen  
Christopher T. Dunn  
125 Broad Street, 19th Floor  
New York, NY 10004  
212-607-3300  
agemmell@nyclu.org

Attorneys for Plaintiffs and the Class in 20 Civ. 1142

AUDREY STRAUSS  
Acting United States Attorney for the  
Southern District of New York

By: /s/ Zachary Bannon  
ZACHARY BANNON  
ELIZABETH KIM  
CHRISTOPHER CONNOLLY  
Assistant United States Attorneys  
86 Chambers St. 3<sup>rd</sup> Floor  
New York, New York 10007  
Tel.: 212-637-2728, 2745, 2761  
Fax: 212-637-2717  
E-mail: Zachary.Bannon@usdoj.gov  
Elizabeth.Kim@usdoj.gov  
Christopher.Connolly@usdoj.gov

Attorneys for the Defendants